

EXHIBIT G



Transcript of Direct Building

Monday, March 1, 2021

Keybank National Association v. Direct Building Products Corp

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Reference Number: 99751

12 TRANSCRIPT of the stenographic notes of
13 the Proposed Remote Videoconferenced deposition of
14 Direct Building Products Corp. in the above-entitled
15 matter, as taken by and before LORRAINE B. ABATE, a
16 Certified Court Reporter and Notary Public of the
17 State of New Jersey and Registered Professional
18 Reporter, held on March 1, 2021, commencing at 10:06
19 a.m., pursuant to Order.

1 A P P E A R A N C E S:

2 (ALL APPEARANCES ARE VIA REMOTE VIDEOCONFERENCE
3 AND/OR TELEPHONE)

4

5 WONG FLEMING, ESQS.

6 Attorneys for the Plaintiff

7 821 Alexander Road

8 Suite 200

9 Princeton, New Jersey 08540

10 BY: DANIELLE PIERRE, ESQ.

11 (609) 951-9520

12 dpierre@wongfleming.com

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I N D E X

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E X H I B I T S

5	PLAINTIFF'S	PAGE
6	1 Notice of Deposition	5
7	2 E-Mail dated February 19, 2021	5
8	3 E-Mail Correspondence	6

9

10 * * * ALL EXHIBITS RECEIVED, MARKED AND
11 RETURNED ELECTRONICALLY * * *

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1 MS. PIERRE: My name is Danielle Pierre,
2 an associate with Wong Fleming, counsel for
3 Keybank National Association.

4 This was to be a Federal Rule of Civil
5 Procedure Rule 30(b) (6) and 69 deposition or
6 debtor's examination of Direct Building Product
7 Corporation related to a judgment entered in
8 favor of Keybank in the Southern District of New
9 York, case No. 20:cv-0059 which was later
10 domesticated to the District of New Jersey, case
11 No. 20-mc-00170.

12 The deposition was set to begin at 10
13 a.m. It is now 10:06 a.m., and the
14 representative for Direct Building Products
15 Corp. has not appeared. In addition, counsel
16 for the deponent is not here.

17 We will go off the record for 15 minutes
18 to give the deponent and/or his counsel a bit
19 more time.

20 (There was a recess taken.)

21 MS. PIERRE: The time is now 10:22 and
22 the deponent and his counsel have not appeared.

23 During the period that we were off the
24 record, I sent an e-mail to counsel for Direct
25 Building reminding him of the deposition start

1 time and asking whether he will be appearing
2 with his client.

3 Counsel responded to my e-mail
4 indicating that he thought we had agreed to
5 reschedule. That is not the case.

6 I'll provide all e-mail correspondence
7 evidencing our communication as exhibits, and I
8 would like to mark a few quick exhibits.

9 As Plaintiff's Exhibit 1, the notice of
10 deposition served upon counsel via e-mail and
11 certified mail to counsel's address to receive
12 service on behalf of Direct Building Products
13 Corporation.

14 (Plaintiff's Exhibit 1, Notice of
15 Deposition, marked for identification, as of
16 this date.)

17 MS. PIERRE: As Plaintiff's Exhibit 2,
18 e-mail correspondence dated February 19, 2021,
19 from myself, Danielle Pierre, counsel for
20 Keybank to counsel for Direct Building, Sheldon
21 Gopstein, asking him to ensure that his client
22 appears for today's examination.

23 (Plaintiff's Exhibit 2, E-Mail dated
24 February 19, 2021, marked for identification, as
25 of this date.)

1 MS. PIERRE: And as Plaintiff's
2 Exhibit 3, all e-mail correspondence between
3 myself and counsel for Direct Building relating
4 to scheduling a date for a deposition of Direct
5 Building.

6 Keybank reserves any and all rights to
7 notice an examination for another date and time,
8 to move to compel the deponent to appear for a
9 deposition, to seek sanctions where appropriate,
10 including reimbursement for the cost incurred in
11 setting up today's deposition, and to file any
12 other such motions where applicable.

13 (Plaintiff's Exhibit 3, E-Mail
14 Correspondence, marked for identification, as of
15 this date.)

16 (Time noted: 10:24 a.m.)

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C E R T I F I C A T E

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3 STATE OF NEW JERSEY)

4 COUNTY OF ESSEX)

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7 I, LORRAINE B. ABATE, a Certified Court
8 Reporter of the State of New Jersey, Registered
9 Professional Reporter and Notary Public, do hereby
10 certify:

11 I reported the proceedings in the
12 within-entitled matter, and that the within
13 transcript is a true record of such proceedings.

14 I further certify that I am not related
15 to any of the parties to this action by blood or
16 marriage, and that I am in no way interested in the
17 outcome of this matter.

18 IN WITNESS WHEREOF, I have hereunto set
19 my hand this 2nd day of March 2021.

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21

22 Lorraine B. Abate, CCR, RPR

23 LORRAINE B. ABATE, CCR, RPR

24

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WORD INDEX	
<0> 08540 2:9 <1> 1 1:18 3:6 5:9, 14 10 4:12 10:06 1:18 4:13 10:22 4:21 10:24 6:16 15 4:17 19 3:7 5:18, 24 <2> 2 3:7 5:17, 23 20:cv-0059 4:9 200 2:8 2021 1:18 3:7 5:18, 24 7:19 20-mc-00170 4:11 2-20-mc-00170- KSH 1:3 2nd 7:19 <3> 3 3:8 6:2, 13 30(b)(6) 4:5 <5> 5 3:6, 7 <6> 6 3:8 609)951-9520 2:11 69 4:5 <8> 821 2:7 <A> a.m 1:19 4:13 6:16 ABATE 1:15 7:7, 23 above-entitled 1:14 ACTION 1:3 7:15 addition 4:15 address 5:11 agreed 5:4 Alexander 2:7 AND/OR 2:3 4:18 appear 6:8 APPEARANCES 2:2 appeared 4:15, 22 appearing 5:1 appears 5:22 applicable 6:12 appropriate 6:9 behalf 5:12 bit 4:18 blood 7:15 BUILDING 1:8, 14 4:6, 14, 25 5:12, 20 6:3, 5 <C> case 4:9, 10 5:5 CCR 7:23 Certified 1:16 5:11 7:7 certify 7:10, 14 CIVIL 1:3 4:4 client 5:2, 21 commencing 1:18 communication 5:7 compel 6:8 CORP 1:8, 14 4:15 Corporation 4:7 5:13 Correspondence 3:8 5:6, 18 6:2, 14 cost 6:10 counsel 4:2, 15, 18, 22, 24 5:3, 10, 19, 20 6:3 counsel's 5:11 COUNTY 7:4 COURT 1:1, 16 7:7 <D> DANIELLE 2:10 4:1 5:19 date 5:16, 25 6:4, 7, 15 dated 3:7 5:18, 23 day 7:19 debtor's 4:6 DEEN 1:8 Defendants 1:9 deponent 4:16, 18, 22 6:8 deposition 1:13 3:6 4:5, 12, 25 5:10, 15 6:4, 9, 11 DIRECT 1:8, 14 4:6, 14, 24 5:12, 20 6:3, 4 DISTRICT 1:1, 2 4:8, 10 domesticated 4:10 <E> ELECTRONICALLY 3:11 E-Mail 3:7, 8 4:24 5:3, 6, 10, 18, 23 6:2, 13 ensure 5:21 entered 4:7 ESQ 2:10 ESQS 2:5 ESSEX 7:4 evidencing 5:7 examination 4:6 5:22 6:7 Exhibit 5:9, 14, 17, 23 6:2, 13 EXHIBITS 3:10 5:7, 8 <F> favor 4:8 February 3:7 5:18, 24 Federal 4:4 file 6:11 FLEMING 2:5 4:2 further 7:14 <G> give 4:18 go 4:17 Gopstein 5:21 <H> hand 7:19 held 1:18 hereunto 7:18 <I> identification 5:15, 24 6:14 including 6:10 incurred 6:10 indicating 5:4 interested 7:16 <J> JERSEY 1:2, 17 2:9 4:10 7:3, 8 judgment 4:7 <K> KEYBANK 1:5 4:3, 8 5:20 6:6 <L> LORRAINE 1:15 <M> mail 5:11 March 1:18 7:19 mark 5:8 MARKED 3:10 5:15, 24 6:14 marriage 7:16 matter 1:15 7:12, 17 minutes 4:17 motions 6:12 move 6:8 <N> name 4:1 NATIONAL 1:5 4:3 NEW 1:2, 17 2:9 4:8, 10 7:3, 8 Notary 1:16 7:9 noted 6:16 notes 1:12 Notice 3:6 5:9, 14 6:7 <O> Order 1:19 outcome 7:17 <P> PAGE 3:5 parties 7:15 period 4:23 PIERRE 2:10 4:1, 21 5:17, 19 6:1 Plaintiff 1:6 2:6 PLAINTIFF'S 3:5 5:9, 14, 17, 23 6:1, 13 Princeton 2:9 Procedure 4:5 proceedings 7:11, 13 Product 4:6 PRODUCTS 1:8, 14 4:14 5:12 Professional 1:17 7:9 Proposed 1:13 provide 5:6 Public 1:16 7:9 pursuant 1:19 <Q> quick 5:8 <R> receive 5:11 RECEIVED 3:10 recess 4:20 record 4:17, 24 7:13 Registered 1:17 7:8 reimbursement 6:10 related 4:7 7:14 relating 6:3 reminding 4:25 Remote 1:13 2:2 reported 7:11 Reporter 1:16, 18 7:8, 9 representative 4:14 reschedule 5:5 reserves 6:6 responded 5:3 RETURNED 3:11 rights 6:6 Road 2:7 RPR 7:23 Rule 4:4, 5 <S> sanctions 6:9 scheduling 6:4 seek 6:9 sent 4:24 served 5:10 service 5:12 set 4:12 7:18 setting 6:11 Sheldon 5:20 Southern 4:8 start 4:25 State 1:17 7:3, 8 STATES 1:1 stenographic 1:12 Suite 2:8 <T> taken 1:15 4:20 TELEPHONE 2:3 thought 5:4 time 4:19, 21 5:1 6:7, 16 today's 5:22 6:11 TRANSCRIPT 1:12 7:13 true 7:13 <U> UNITED 1:1 <V> VIDEOCONFERENCE NCE 2:2 Videoconferenced	

1:13
vs 1:7

<W>
way 7:16
WHEREOF 7:18
within-entitled 7:12
WITNESS 7:18
WONG 2:5 4:2

<Y>
YOEL 1:8
York 4:9